

No. 22-13626

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

ANNA LANGE,
Plaintiff-Appellee,

—v.—

HOUSTON COUNTY, GEORGIA, et al.,
Defendants-Appellants.

On Appeal from the United States District Court
for the Middle District of Georgia
D.C. Docket No. 5:19-cv-00382-MTT

**UNOPPOSED MOTION OF THE LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW, NATIONAL EMPLOYMENT LAW PROJECT,
AND LATINOJUSTICE PRLDEF FOR LEAVE TO FILE AMICI CURIAE
BRIEF IN SUPPORT OF PLAINTIFF-APPELLEE AND AFFIRMANCE**

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Houston County, Georgia et. al., v. Anna Lange, Case No. 22-13626-DD

**RULE 29(A)(4)(A) CORPORATE DISCLOSURE STATEMENT AND
CERTIFICATE OF INTERESTED PERSONS**

Pursuant to Fed. R. App. P. 26.1 and 29(c), and Eleventh Circuit Rules 26.1-1(a)(3), 26.1-2(b) and 28-1(b), each of the undersigned *amici curiae* disclose that it is a non-profit organization with no parent corporation and that no publicly-held corporation owns 10% or more of its stock. Amici curiae is not aware of any publicly owned corporation that has a financial interest in the outcome of this litigation and has not cooperated with such corporation.

The undersigned counsel of record certifies that the following listed persons and entities have an interest in the outcome of this case:

1. Lawyers' Committee For Civil Rights Under Law – *Amicus Curiae*;
2. National Employment Law Project- *Amicus Curiae*;
3. LatinoJustice PRLDEF– *Amicus Curiae*.

Respectfully submitted

/s/ Kathryn J. Youker
Kathryn J. Youker
Counsel of Record

Dated: October 30, 2024

**UNOPPOSED MOTION FOR LEAVE TO
FILE AMICI CURIAE BRIEF**

Pursuant to Federal Rule of Appellate Procedure 29(b) and Eleventh Circuit Rule 29, the Lawyers’ Committee for Civil Rights Under Law (“Lawyers’ Committee”) respectfully submits this unopposed Motion for Leave to File *Amici Curiae* Brief in Support of Plaintiff-Appellee’s *en banc* brief and affirmance. The proposed brief is attached to this Motion. In support of this Motion, *amici* states as follows:

1. Formed in 1963, the Lawyer’s Committee is a nonpartisan, nonprofit organization that uses legal advocacy to achieve racial justice, fighting inside and outside the courts to ensure that Black people and other people of color have the voice, opportunity, and power to make the promises of our democracy real. To this end, the Lawyers’ Committee has participated in hundreds of cases involving issues related to voting rights, housing, employment, education, and public accommodations. See, e.g., *Students for Fair Admissions, Inc. v. Univ. of N.C.*, No. 21-707; *Bostock v. Clayton Cty.*, Nos. 17-1618, 17-1632, 18-107.
2. Leave to file a brief as *amicus curiae* should be granted when “the *amici* have stated an ‘interest in the case,’ and it appears that their brief is ‘relevant’ and ‘desirable.’” see Fed. R. App. Pro. 29(a)(3). As a leading

national racial justice organization, the Lawyers' Committee has a vested interest in ensuring that people of color, including those who identify as lesbian, gay, bisexual, and transgender ("LGBTQ+"), have strong, enforceable protections from employment discrimination. Title VII's civil rights protections are especially imperative for other systemically marginalized workers, and those with multiple intersecting identities, including Black LGBTQ+ workers.

3. Participation by proposed *amici* should assist the Court in understanding the rights of LGBTQ+ workers under Title VII and how a heightened evidentiary standard in cases challenging facially discriminatory policies would have grave impacts on Black workers and other systemically marginalized workers.
4. Proposed *amici's* participation will not delay proceedings or prejudice any party in this case.
5. Counsel for all parties consented to the filing of this Motion.
6. This Motion is timely under Eleventh Circuit Rule 35-8, being filed on the same day as when Plaintiff Appellee's *en banc* brief is due.

For these reasons, Lawyers' Committee respectfully moves for leave to file the attached *amicus* brief in support of Plaintiff-Appellee's *en banc* brief and affirmance.

Respectfully Submitted,

/s/ Kathryn J. Youker

Kathryn J. Youker

Counsel of Record

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CERTIFICATE OF COMPLIANCE

1. This document complies with the type-volume limit of Fed. R. App. P. 27(d)(2) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), this motion contains 372 words.
2. This document complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word 365 in 12-point Times New Roman font.
3. This document has been scanned for viruses and is virus-free.

Dated: October 30, 2024

/s Kathryn J. Youker
Kathryn J. Youker

CERTIFICATE OF SERVICE

I, Kathryn J. Youker, an attorney, certify that on this day the foregoing Motion was served electronically on all parties via CM/ECF.

Dated: October 30, 2024

s/ Kathryn J. Youker
Kathryn J. Youker